



North America Europe Asia

35 W. Wacker Drive
Chicago, IL 60601
T +1 312 558 5600
F +1 312 558 5700

LUKE A. CONNELLY

Partner
212-294-6882
LConnelly@winston.com

November 4, 2020

Hon. Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

**Re: *Beat the Streets Wrestling, Inc., v. Arthur J Gallagher Risk Management Services, Inc.*,
Case No. 20-CV-7265 (RA), Request for Extension of Time**

Dear Judge Abrams:

This firm represents Defendant Arthur J. Gallagher Risk Management Services, Inc. (“Gallagher”) in the above-referenced matter. We write pursuant to Local Rule 7.1(d), and your Honor’s Individual Rule 1.D, to request an extension of Gallagher’s time to answer, move or otherwise respond to the Complaint (ECF No.1). The original due date for Gallagher to respond was September 30, 2020. On September 28, 2020, the Court granted Gallagher’s first request for an extension to November 9, 2020 (ECF No. 12). Gallagher respectfully requests that the Court extend the deadline for Gallagher to answer, move or otherwise respond to the Complaint to December 10, 2020. This is Gallagher’s second request for an extension.

In addition, the parties’ joint status letter, proposed case management plan, and scheduling order are due on November 13, 2020, and the parties’ initial status conference is set for November 20, 2020 at 3:30 pm (ECF No. 7). Gallagher respectfully requests that the Court extend the deadline for the parties’ joint status letter, proposed case management plan, and scheduling order to December 14, 2020, and reschedule the initial status conference to a date on or after December 22, 2020. This is Gallagher’s first request for an extension of these deadlines.

Plaintiff does not object to these extensions. Counsel for both parties have been in discussions about this case and have agreed to the proposed extensions.

Thank you in advance for the Court’s attention to this letter motion. Please let us know if the Court needs any additional information to grant the extension. Gallagher respectfully requests that the Court approve the requested extension of time by endorsing this letter-motion.

Respectfully submitted,

s/ Luke A. Connelly

Luke A. Connelly

WINSTON
& STRAWN
LLP

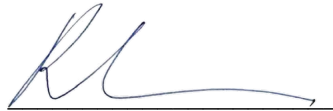
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WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 294-6700
Facsimile: (212) 294-4700
Email: lconnelly@winston.com

cc: All Counsel of Record (via ECF)

Application granted. Defendant's time to respond to the Complaint is extended to December 10, 2020. No later than December 15, 2020, the parties shall submit a joint letter, case management plan, and proposed scheduling order. The initial status conference scheduled for November 20, 2020 is hereby adjourned to Tuesday, December 22, 2020 at 11:15 a.m.

SO ORDERED.


Hon. Ronnie Abrams
11/5/2020